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May 6, 2020

BY ECF

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Granted. SO ORDERED.

Date: 5/7/2020
New York, New York

A handwritten signature of Mary Kay Vyskocil in black ink.
Mary Kay Vyskocil
United States District Judge

Re: *R3Asia Pacific, PTE, LTD and R3 Worldwide, Inc. v. Melissa Lea*
U.S. District Court, Southern District of New York
Case No. 1:20-cv-01941

Dear Judge Vyskocil:

Pursuant to Fed. R. Civ. P. 6(b), Local Rule 7.1(d), and Rule 2.G of Your Honor's Individual Rules of Practice in Civil Cases, Defendant Melissa Lea, by her counsel, moves, with agreement and consent of Plaintiff's counsel, to extend until May 21, 2020 the date for Defendant to file and serve a pleading in response to the Complaint and Summons served April 16, 2020. The original due date is May 7, 2020. There has been no previous request for an extension. The reason for the request is the parties, through counsel, have been and are engaged in good faith settlement discussions, and additional time is necessary to determine whether the case can be resolved without motion practice or any further activity. There is good cause for submission of this request less than 72 hours prior to the original deadline because counsel had a productive settlement call yesterday afternoon, and the resources of the Court and the parties will be conserved by the requested extension.

For the above reasons, Defendant respectfully requests a two-week extension of time until May 21, 2020 to file and serve a pleading in response to the Complaint and Summons.

Respectfully submitted,

A handwritten signature of Joshua N. Ruby in black ink.

Counsel for Defendant Melissa Lea

JNR/jlf

cc: Christian J. Jensen, Esq. (via ECF)
Howard Matalon, Esq. (via ECF)
Stanley K Shapiro, Esq. (via ECF)
T. Christopher Donnelly (via Email)